

1 DAVID H. BECKER, ESQ. (Pro Hac Vice)
Oregon Bar No. 081507
2 Law Office of David H. Becker, LLC
917 SW Oak St., Suite 409
3 Portland, Oregon 97205
(503) 388-9160
4 davebeckerlaw@gmail.com

5 DAVID A. BAHR, ESQ. (Pro Hac Vice)
Oregon Bar No. 90199
6 Bahr Law Offices, P.C.
1035 1/2 Monroe St.
7 Eugene, Oregon 97402
(541) 556-6439
8 davebahr@mindspring.com

9 WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP
10 CHRISTOPHER W. MIXSON, ESQ.
Nevada Bar No. 10685
11 5594-B Longley Lane
Reno, Nevada 89511
12 (775) 853-6787/Fax: (775) 853-6774
cmixson@wrslawyers.com

13 *Attorneys for Plaintiff Basin and Range Watch*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 _____
17 BASIN AND RANGE WATCH,) Civil Action No.: 2:16-cv-00403 JCM-PAL
18 Plaintiff,)
19 v.)
20 BUREAU OF LAND MANAGEMENT) **JOINT MOTION FOR EXTENSION OF**
AND THE U.S. DEPARTMENT OF THE) **BRIEFING ON FEES MOTION**
INTERIOR,) **(FIRST REQUEST)**
21)
22 Defendants.)
23 _____

24 On January 21, 2017, the Court entered an order (ECF #41) setting a briefing schedule for the
25 parties Motion for Attorneys' Fees and Costs. Plaintiff filed its Motion for Attorneys' Fees and Costs on
26 March 1, 2017. The briefing schedule called for Federal Defendants to file their response by March 31,

STEVEN W. MYHRE
Acting United States Attorney
District of Nevada
TROY K. FLAKE
Assistant United States Attorney
U.S. Attorney's Office
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Facsimile: 702-388-6787
Email: troy.flake@usdoj.gov

Attorneys for the Federal Defendants

1 2017, and for Plaintiff to file its reply by April 21, 2017. It is expected that resolution of the fees motion
2 will be dispositive of this case. *See* ECF #55 at 2:1-2.

3 The parties respectfully request that the briefing schedule be modified as follows:

4 **April 14, 2017** – Federal Defendants’ Response to Motion for Attorneys’ Fees and Costs

5 **May 17, 2017** – Plaintiff’s Reply in Support of Motion for Attorneys’ Fees and Costs

6 The parties do no seek this extension for purposes of delay, and good cause exists for the court to
7 grant this extension. Specifically the need for additional time is a result of delays caused by reduced
8 staffing levels at the agencies involved and official travel by the attorney for the Federal defendant, and
9 Plaintiff’s counsel’s previously-scheduled travel throughout the last week of April and obligation on
10 other matters. The parties are confident that this additional time will be adequate to complete the
11 briefing.

12 Respectfully submitted this 28th day of March 2017.

13 STEVEN W. MYHRE
14 Acting United States Attorney

15 /s/ Troy K. Flake
16 Troy K. Flake
17 Assistant United States Attorney
Of Attorneys for Federal Defendants

15 /s/ David H. Becker
16 David H. Becker, *Pro Hac Vice*
17 *Of Attorneys for Plaintiff*

18
19
20 It is so ordered.
21

22 
23 United States District/Magistrate Judge
24

25
26 Dated: March 31, 2017